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November 18, 2020

Via Online Submission at <https://www.foiaonline.gov>

EPA FOIA Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request; Records for Quanta Site

To Whom it May Concern:

This is a request under the Freedom of Information Act ("FOIA"), 5 U.S.C. §552 *et seq.* from counsel for the New Jersey Department of Environmental Protection to the United States Environmental Protection Agency related to the following property:

The Quanta Resources Site
163 River Road
Edgewater, Bergen County
New Jersey 07020

This property is designated as Block 93, Lots 1, 2, and 3 on the Tax Map of Edgewater, New Jersey.

We request access to and true and correct copies of all information and other records, including but not limited to, documents of any kind including electronic as well as paper documents, all data, data bases, surveys, graphs, charts, photographs, maps, studies, notes, field notes, videos, e-mails, writings (handwritten, typed, electronic or otherwise produced, reproduced or stored), correspondence, letters, memoranda, reports, decision documents, consultations, papers, recordings, telephone conversation recordings, voice mails, telephone logs, messages, instant messages, G-chats, text messages, chats, telefaxes, drawings, meeting notes or minutes, and electronic records of meetings in your possession related the EPA's oversight of the Quanta Resources Site, except for the official Administrative Record for the Quanta Resources Site, Volumes 1 through 5, dated June 2002 and prepared for Robert J. Montgomery, On-Scene Coordinator at U.S. EPA Region II, Removal Action Branch, Edison, New Jersey 08837.¹

¹ The Administrative Record for the Quanta Resources Site is a five-volume document consisting of approximately 3,089 pages, a copy of which we already have in our possession. Thus, this FOIA Request

This FOIA Request includes any and all nonexempt portions of records that are otherwise determined to be exempt from review under the FOIA pursuant to 5 U.S.C. §552(b).

We look forward to a response and determination from your office within twenty working days of receipt of this request consistent with 5 U.S.C. § 552(a)(6). Should EPA decide to invoke a FOIA exemption, please include information sufficient for us to appeal the denial in accordance with 5 U.S.C. § 552(a)(6). Simultaneously, please include with your full or partial denial, at a minimum, (1) a detailed index/ list of the records withheld, including the name of the record, the subject of the record, the author of the record, and the date of the record; and (2) EPA's basis for withholding the records. *Vaughn v. Rosen*, 484 F.2d 820, 823-28 (D.C. Cir. 1973), *cert. denied* 415 U.S. 977 (1974).

We are willing to pay fees for this request up to a maximum of \$500.00. If you estimate that the fees will exceed this limit, please inform us first with a cost estimate. In order to help with processing time and shipping fees, we request that the information requested be provided in electronic format.

Please contact me at (504) 212-1757 or k.wells@kanner-law.com if any further information is necessary and particularly if it is impossible to exclude the EPA's official Administrative Record from the additional documents and data related to EPA oversight of the Quanta Site that we seek in this Request. Thank you very much for your consideration and prompt response to this request.

Sincerely,

KANNER & WHITELEY, L.L.C.

By: 
Katherine B. Wells

seeks all documents, particularly data, related to the EPA's oversight of the Quanta Resources Site that are in your agency's possession, besides the referenced official Administrative Record.